

AUSA: Rebecca Delfiner

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SUZANNE ACCURSO,

Defendant.

24 MAG 3078

RULE 5(c)(3)
AFFIDAVIT

SOUTHERN DISTRICT OF NEW YORK, ss.:

SONNY SANTISTEVAN, being duly sworn, deposes and says that he is a Special Agent with the U.S. Department of State, and charges as follows:

On or about April 3, 2024, the United States District Court for the Eastern District of Missouri issued an arrest warrant for the arrest of "Suzanne Accurso" based on an Indictment charging her and others with conspiring to commit bank fraud, in violation of 18 U.S.C. § 1349. A copy of the Indictment and warrant are attached hereto as Exhibit A and are incorporated by reference herein.

I believe that SUZANNE ACCURSO, the defendant, is the same individual as the "Suzanne Accurso" who is named in the arrest warrant issued by the United States District Court for the Eastern District of Missouri.

The bases for my knowledge and for the foregoing are, in part, as follows:

1. I am a Special Agent with the U.S. Department of State. This affidavit is based upon my personal participation in this matter, as well as on my conversations with other law enforcement officers, my examination of documents, reports, and records, and my personal observations of the defendant. I have been personally involved in determining whether SUZANNE ACCURSO, the defendant, is the same individual as the "Suzanne Accurso" named in the April 3, 2024 arrest warrant issued by the United States District Court for the Eastern District of Missouri (the "Warrant"). Because this Affidavit is being submitted for the limited purpose of establishing the identity of the defendant, I have not included in this Affidavit each and every fact that I have learned. Where I report statements made by others, those statements are described in substance and in part unless otherwise noted.

2. Based on my review of documents from proceedings in the United States District Court for the Eastern District of Missouri, I know that, on or about April 3, 2024, "Suzanne Accurso" was charged by Indictment with conspiring to commit bank fraud, in violation of 18 U.S.C. § 1349, and the Warrant was issued for her arrest.

AUSA: Rebecca Delfiner

3. Based on my participation in this matter, I know that on or about August 21, 2024, at approximately 4:00 p.m., SUZANNE ACCURSO, the defendant, was arrested in Mount Vernon, New York.

4. I believe that SUZANNE ACCURSO, the defendant, is the same person as the "Suzanne Accurso" listed in the Warrant because, ACCURSO identified herself to law enforcement agents as "Suzanne Accurso."

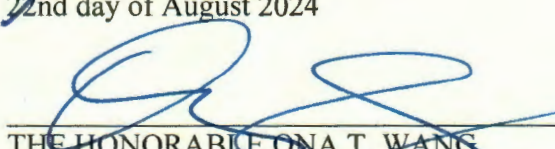
5. I also believe that SUZANNE ACCURSO, the defendant, is the same person as the "Suzanne Accurso" listed in the Warrant because she provided law enforcement agents with her date of birth, which matches the date of birth that law enforcement agents previously informed me was associated with the "Suzanne Accurso" listed in the Warrant.

6. In addition, I believe that SUZANNE ACCURSO, the defendant, is the same person as the "Suzanne Accurso" listed in the Warrant because the physical appearance of ACCURSO is materially the same as her appearance in a Florida driver's license photograph located in the case file that law enforcement agents provided me for the "Suzanne Accurso" listed in the Warrant.

WHEREFORE, I respectfully request that SUZANNE ACCURSO, the defendant, be imprisoned or bailed, as the case may be.

s/ Sonny Santistevan /oan
SONNY SANTISTEVAN
Special Agent
U.S. Department of State

23rd Sworn to before me this
22nd day of August 2024


THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

DUPLICATE ORIGINAL
Original signed during
8/21 in-person
proceeding /oan

AUSA: Rebecca Delfiner

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

APR - 3 2024

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. S1 4:24-cr-00002-SEP-JMB

MICHAEL GRODNER,
ANTHONY RAMOS,
RUBEN VIRUET-STEVENSON,
CLEMENTE CASTRACUCCO,
TIMOTHY DERRICO,
CASEY SEDBERRY,
SUZANNE ACCURSO,
OLADIRAN AJAYI-OBE a/k/a "TJ",
RICHARD OWENS a/k/a "POPS", and
HENNA HARRIS a/k/a "H",

Defendants.

SUPERSEDING INDICTMENT

The Grand Jury charges that, at times relevant to this Indictment:

INTRODUCTION

1. The defendants were members of a conspiracy that carried out a bank-fraud scheme across the country. As part of the scheme, the conspirators obtained counterfeit ID cards, including counterfeit United States passport cards, that displayed photographs of the conspirators but reflected the names and dates of birth of the conspirators' victims—namely, people who had legitimate accounts at FDIC-insured banks. The conspirators went to the victims' banks and used the counterfeit ID cards to impersonate the victims and fraudulently withdraw money from the victims' accounts. Through the defendants' bank-fraud scheme, the conspirators fraudulently obtained, or attempted to obtain, hundreds of thousands of dollars from more than 15 FDIC-insured banks in over 10 states.

FEDERALLY-INSURED FINANCIAL INSTITUTIONS

2. Each of the banks listed below is a “financial institution” within the meaning of 18 U.S.C. § 20(1), in that the deposits of each are insured by the Federal Deposit Insurance Corporation (“FDIC”), and each has branch locations in, among other places, the states specified below:

- a. BancFirst: Oklahoma;
- b. Banner Bank: Oregon and Washington;
- c. BMO Bank National Association (“BMO”): Wisconsin;
- d. BOKF, National Association (“BOKF”): Arizona, New Mexico, and Texas;
- e. Columbia State Bank n/k/a Umpqua Bank (“Columbia State Bank”):

Oregon and Washington;

- f. Commerce Bank: Missouri;
- g. First Horizon Bank: Louisiana;
- h. German American Bank: Indiana and Kentucky;
- i. Ixonia Bank: Wisconsin;
- j. Johnson Bank: Wisconsin;
- k. Monona Bank n/k/a Lake Ridge Bank (“Monona Bank”): Wisconsin;
- l. Simmons Bank: Arkansas;
- m. Town Bank, National Association (“Town Bank”): Wisconsin;
- n. UMB Bank, National Association (“UMB Bank”): Arizona, Kansas, and

Missouri;

- o. Washington Federal Bank (“WaFd Bank”): Washington;

- p. Waukesha State Bank: Wisconsin; and
- q. Westbury Bank: Wisconsin.

COUNT ONE
(Bank Fraud Conspiracy: 18 U.S.C. § 1349)

3. Beginning by at least in or around August 2022, and continuing through at least in or around March 2023, within the Eastern District of Missouri and elsewhere, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS,
RUBEN VIRUET-STEVENSON,
CLEMENTE CASTRACUCCO,
TIMOTHY DERRICO,
CASEY SEDBERRY,
SUZANNE ACCURSO,
OLADIRAN AJAYI-OBE a/k/a "TJ",
RICHARD OWENS a/k/a "POPS", and
HENNA HARRIS a/k/a "H",**

voluntarily and intentionally combined, conspired, confederated, and agreed with one another and others, known and unknown to the Grand Jury, to commit bank fraud, that is, to knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of financial institutions by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

Object of the Conspiracy

4. The object of the conspiracy was to fraudulently obtain money from FDIC-insured banks by using counterfeit ID cards, including counterfeit United States passport cards, to impersonate victims who had legitimate accounts at the banks and make unauthorized withdrawals from those accounts.

Manner and Means of the Conspiracy

It was part of the conspiracy that:

5. Defendant Richard Owens a/k/a “Pops” (“Defendant Owens”) and Defendant Henna Harris a/k/a “H” (“Defendant Harris”), along with other conspirators, known and unknown to the Grand Jury, recruited conspirators, including, but not limited to, Defendant Michael Grodner (“Defendant Grodner”), to join and participate in the defendants’ bank-fraud scheme.

6. Defendant Oladiran Ajayi-Obe a/k/a “TJ” (“Defendant Ajayi-Obe”), along with other conspirators, known and unknown to the Grand Jury, served as an organizer of the conspiracy in that, among other things:

a. Defendant Ajayi-Obe obtained counterfeit ID cards, including counterfeit United States passport cards, so that other conspirators could carry out the defendants’ bank-fraud scheme by using the cards to impersonate victim account holders;

b. Defendant Ajayi-Obe booked flights so that he and other conspirators could carry out the defendants’ bank-fraud scheme by travelling to and from states across the country where the victim account holders’ banks were located. When the conspirators travelled on these flights, some flew under their own names, and some flew under other people’s names; and

c. Defendant Ajayi-Obe rented cars so that once he and other conspirators reached their flights’ end destinations, they could carry out the defendants’ bank-fraud scheme by driving to banks at which the victim account holders had accounts. On numerous occasions, Defendant Ajayi-Obe rented the cars using a counterfeit ID card that reflected the name “Mohamed Ifthikar.”

7. After travelling on the flights and renting the cars, one or more of the conspirators typically served as a driver; one or more of the conspirators typically served as the person who went inside the banks to impersonate victim account holders; and one or more of the conspirators sometimes served as an observer to learn how the defendants' bank-fraud scheme operated. On numerous occasions, Defendant Ajayi-Obe and Defendant Anthony Ramos ("Defendant Ramos") served as a driver, and Defendant Grodner, Defendant Clemente Castracucco ("Defendant Castracucco"), Defendant Timothy Derrico ("Defendant Derrico"), Defendant Casey Sedberry ("Defendant Sedberry"), and Defendant Suzanne Accurso ("Defendant Accurso") served as the person who went inside the banks to impersonate victim account holders. And, on at least one occasion, Defendant Ruben Viruet-Stevens ("Defendant Viruet-Stevens") served as an observer to learn how the defendants' bank-fraud scheme operated.

8. Before the conspirators went inside the banks, another conspirator provided them with counterfeit ID cards, including counterfeit United States passport cards. The counterfeit ID cards reflected the names and dates of birth of victims who had legitimate accounts at the banks. However, despite reflecting the names and dates of birth of the victim account holders, the counterfeit ID cards displayed photographs of the conspirators who went inside the banks to impersonate the victim account holders.

9. Before the conspirators went inside the banks, another conspirator provided them with other identifying information, such as social security numbers, of the victim account holders. On numerous occasions, the conspirators also created and obtained counterfeit checks that reflected the victim account holders' information.

10. When the conspirators went inside the banks and used counterfeit ID cards, including counterfeit United States passport cards, to impersonate victim account holders, they sometimes deposited counterfeit checks into the victims' accounts and then immediately withdrew money from the accounts, and they sometimes simply withdrew money from the accounts without first depositing counterfeit checks.

11. Between in or around August 2022 and in or around March 2023, the conspirators used the manner and means described above to carry out the defendants' bank-fraud scheme at more than 15 FDIC-insured banks in over 10 states and, in doing so, fraudulently obtained, or attempted to obtain, more than \$200,000 from those banks; including, but not limited to, on the following occasions:

| Date | Bank | City, State | Conspirators | Actual/Attempted Counterfeit Check Deposit Amount | Actual/Attempted Withdrawal Amount |
|---------|---------------------|-------------------|---|---|------------------------------------|
| 8/18/22 | WaFd | Auburn, WA | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$6,000 |
| 8/18/22 | Banner Bank | Federal Way, WA | Defendant Castracucco Defendant Ajayi-Obe | None | \$2,500 |
| 8/18/22 | Banner Bank | Kent, WA | Defendant Castracucco Defendant Ajayi-Obe | \$3,900 | \$3,900 |
| 8/18/22 | Columbia State Bank | Auburn, WA | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$6,500 |
| 8/19/22 | WaFd | Federal Way, WA | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$6,000 |
| 8/23/22 | Banner Bank | Mercer Island, WA | Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe | \$4,500 | None |
| 8/24/22 | WaFd | Kent, WA | Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe | \$4,500 | \$4,500 |
| 8/25/22 | Columbia State Bank | Auburn, WA | Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe | \$4,500 | \$6,500 |

| Date | Bank | City, State | Conspirators | Actual/Attempted Counterfeit Check Deposit Amount | Actual/Attempted Withdrawal Amount |
|----------|----------------------|-----------------|--|---|------------------------------------|
| 8/25/22 | Banner Bank | Renton, WA | Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe | None | \$6,500 |
| 9/13/22 | Columbia State Bank | Salem, OR | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$6,500 |
| 9/13/22 | Banner Bank | Tualatin, OR | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | None |
| 9/14/22 | Columbia State Bank | Tigard, OR | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$6,500 |
| 9/22/22 | German American Bank | Greensburg, IN | Defendant Castracucco Defendant Ajayi-Obe | None | \$6,000 |
| 9/22/22 | German American Bank | Columbus, IN | Defendant Castracucco Defendant Ajayi-Obe | None | \$4,500 |
| 10/4/22 | German American Bank | La Grange, KY | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$7,000 |
| 10/4/22 | German American Bank | Shelbyville, KY | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$4,000 |
| 10/13/22 | German American Bank | Shelbyville, KY | Defendant Castracucco Defendant Ajayi-Obe Defendant Derrico | None | \$6,500 \$1,000 |
| 10/27/22 | BOKF | Albuquerque, NM | Defendant Castracucco Defendant Ajayi-Obe | \$4,500 | \$7,500 |
| 10/27/22 | BOKF | Albuquerque, NM | Defendant Castracucco Defendant Ajayi-Obe | None | \$5,000 |
| 11/1/22 | UMB Bank | Peoria, AZ | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$7,500 |
| 11/1/22 | UMB Bank | Phoenix, AZ | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | None | \$6,000 |
| 11/1/22 | BOKF | Mesa, AZ | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$7,500 |

| Date | Bank | City, State | Conspirators | Actual/Attempted Counterfeit Check Deposit Amount | Actual/Attempted Withdrawal Amount |
|----------|---------------------|---------------------|--|---|------------------------------------|
| 11/18/22 | BOKF | Dallas, TX | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos | \$4,500 | None |
| 11/29/22 | Waukesha State Bank | New Berlin, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$6,500 |
| 11/29/22 | Westbury Bank | Germantown, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$3,500 |
| 11/30/22 | Johnson Bank | Racine, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$6,500 \$1,500 |
| 11/30/22 | Johnson Bank | Kenosha, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | None | \$5,000 |
| 11/30/22 | Johnson Bank | Racine, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$7,000 \$2,000 |
| 11/30/22 | BMO | Kenosha, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$8,000 |
| 11/30/22 | BMO | South Milwaukee, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | None | \$1,000 |
| 12/1/22 | Monona Bank | Cottage Grove, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$6,000 |
| 12/1/22 | Monona Bank | Monona, WI | Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | None | \$4,000 |

| Date | Bank | City, State | Conspirators | Actual/Attempted Counterfeit Check Deposit Amount | Actual/Attempted Withdrawal Amount |
|---------|---------------------|---------------------|--|---|------------------------------------|
| 1/5/23 | Simmons Bank | Cabot, AR | Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,200 | None |
| 1/5/23 | Simmons Bank | Conway, AR | Defendant Ajayi-Obe Defendant Ramos Defendant Accurso | \$4,500 | \$6,500 |
| 1/13/23 | First Horizon Bank | New Orleans, LA | Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry | \$4,500 | \$8,000 |
| 1/13/23 | First Horizon Bank | Metairie, LA | Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry | None | \$5,000 |
| 1/13/23 | First Horizon Bank | Kenner, LA | Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry | \$4,500 | \$8,000 |
| 1/13/23 | First Horizon Bank | Metairie, LA | Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry | None | \$6,500 |
| 2/9/23 | Waukesha State Bank | Menomonee Falls, WI | Defendant Ajayi-Obe Defendant Ramos Defendant Grodner | \$4,500 | \$6,000 |
| 2/10/23 | Town Bank | Delafield, WI | Defendant Ajayi-Obe Defendant Ramos Defendant Grodner | \$4,500 | \$6,000 |
| 2/10/23 | Town Bank | Wales, WI | Defendant Ajayi-Obe Defendant Ramos Defendant Grodner | None | \$6,200 |
| 2/10/23 | Ixonia Bank | Oconomowoc, WI | Defendant Ajayi-Obe Defendant Ramos Defendant Grodner | \$4,500 | \$6,000 |
| 2/15/23 | BancFirst | Yukon, OK | Defendant Ajayi-Obe Defendant Grodner | \$4,500 | None |
| 3/1/23 | UMB Bank | Kansas City, KS | Defendant Ajayi-Obe Defendant Grodner | \$4,500 | \$8,200 |
| 3/1/23 | UMB Bank | Kansas City, KS | Defendant Ajayi-Obe Defendant Grodner | None | \$7,200 |
| 3/2/23 | UMB Bank | Kansas City, MO | Defendant Ajayi-Obe Defendant Grodner | \$4,500 | \$7,500 |
| 3/2/23 | Commerce Bank | Kansas City, MO | Defendant Ajayi-Obe Defendant Grodner | \$4,500 | \$8,000 |

| Date | Bank | City, State | Conspirators | Actual/Attempted Counterfeit Check Deposit Amount | Actual/Attempted Withdrawal Amount |
|---------|----------|--|---|---|------------------------------------|
| 3/16/23 | UMB Bank | Maryland Heights, MO (within the Eastern District of Missouri) | Defendant Ajayi-Obe Defendant Grodner Defendant Ramos Defendant Viruet-Stevens | \$4,500 | None |

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Bank Fraud: 18 U.S.C. §§ 1344 and 2)

12. The above paragraphs are hereby realleged and incorporated by reference.

13. On or about March 16, 2023, Defendant Ajayi-Obe (flying under the name “Fritz Oslyn”), Defendant Grodner, Defendant Ramos, and Ruben Viruet-Stevens flew together from LaGuardia Airport to St. Louis Lambert International Airport.

14. When the group arrived in St. Louis, Defendant Ajayi-Obe rented a car from Enterprise Rent-A-Car by using a counterfeit ID card that reflected the name “Mohamed Ifthikar.”

15. Defendant Ramos then drove the rental car to UMB Bank in Maryland Heights, Missouri, within the Eastern District of Missouri, with Defendant Grodner riding in the front passenger seat of the car and Ruben Viruet-Stevens riding in the backseat of the car.

16. While Defendant Ramos and Ruben Viruet-Stevens (who was observing and learning the mechanics of the defendants’ bank-fraud scheme) sat in the car, Defendant Grodner went inside the bank with a counterfeit United States passport card that Defendant Ajayi-Obe had obtained. The counterfeit United States passport card reflected victim account holder C.J.V.’s name and date of birth but displayed Defendant Grodner’s photograph. Before Defendant Grodner went inside the bank, Defendant Ajayi-Obe provided him with other identifying information of victim account holder C.J.V. and C.J.V.’s business. After Defendant Grodner went inside the bank,

he used the counterfeit United States passport card to impersonate C.J.V. and attempted to deposit a counterfeit check into C.J.V.'s business's legitimate account at the bank.

17. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS, and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, that is, UMB Bank, which is FDIC-insured, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of such financial institution by means of material false and fraudulent pretenses, representations, and promises.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE
(Use of False Passport: 18 U.S.C. §§ 1543 and 2)

18. The above paragraphs are hereby realleged and incorporated by reference.

19. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS, and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, willfully and knowingly used, attempted to use, and furnished to another for use a false, forged, and counterfeited passport and instrument purporting to be a

passport, to wit, a counterfeit United States passport card that reflected the name and date of birth of C.J.V. but displayed a photograph of Defendant Grodner.

All in violation of Title 18, United States Code, Sections 1543 and 2.

COUNT FOUR
(Aggravated Identity Theft: 18 U.S.C. §§ 1028A and 2)

20. The above paragraphs are hereby realleged and incorporated by reference.

21. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS, and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that being bank fraud in violation of 18 U.S.C. § 1344, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, to wit, a counterfeit United States passport card that contained the name and date of birth of C.J.V. but displayed a photograph of Defendant Grodner, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS FIVE-NINE
(Aggravated Identity Theft: 18 U.S.C. §§ 1028A and 2)

22. The above paragraphs are hereby realleged and incorporated by reference.

23. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that being a conspiracy to commit bank fraud in violation of 18 U.S.C. § 1349, knowingly transferred and possessed, without lawful authority, a means of identification of another person, described below for each count, knowing that the means of identification belonged to another actual person:

| Count | Means of Identification |
|-------|--|
| 5 | Counterfeit United States passport card bearing the name and date of birth of C.A.E. |
| 6 | KeyBank credit card bearing the name C.A.E. |
| 7 | Counterfeit United States passport card bearing the name and date of birth of M.C.O. |
| 8 | Counterfeit United States passport card bearing the name and date of birth of K.G.T. |
| 9 | KeyBank credit card bearing the name K.G.T. |

All in violation of Title 18, United States Code, Sections 1028A and 2.

FORFEITURE ALLEGATION

The Grand Jury further alleges there is probable cause that:

1. Pursuant to Title 18, United States Code, Section 982(a)(2), upon conviction of a conspiracy to violate Title 18, United States Code, Section 1344, affecting a financial institution, as set forth in Count One, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation.

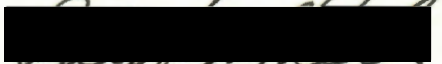
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting, or derived from, any proceeds traceable to such violation.

3. If any of the property described above, as a result of any act or omission of the defendants:

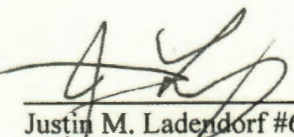
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.


FOREPERSON

SAYLER A. FLEMING
United States Attorney


Justin M. Ladendorf #68558MO
Assistant United States Attorney

AO 442 (Rev. 11/11) Arrest Warrant

SUPPRESSED

UNITED STATES DISTRICT COURT

for the

EASTERN DISTRICT OF MISSOURI

United States of America

v.

Suzanne Accurso

Case No. S1-4:24-cr-00002-SEP-JMB

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Suzanne Accurso

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☒ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 1349 - Bank Fraud Conspiracy

DETENTION

Date: 4-3-2024City and state: St. Louis, MO

Issuing officer's signature

NATHAN M. GRAVES
Clerk, United States District Court

Printed name and title

ReturnThis warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

AUSA: JUSTIN M. LADENDORF

AO 442 (Rev. 11/11) Arrest Warrant (Page 2)

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: Suzanne Accurso

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth:

Social Security number:

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (name, relation, address, phone number): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: Department of State, Bureau of Diplomatic Security / SA Jason Fatchett

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): _____

Date of last contact with pretrial services or probation officer (if applicable): _____